



U.S. Department of the Interior
Office of Inspector General

AUDIT REPORT

CULTURAL RESOURCE MANAGEMENT,
BUREAU OF LAND MANAGEMENT

REPORT NO. 99-I-808
SEPTEMBER 1999



United States Department of the Interior

OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20240

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Memorandum

To: Assistant Secretary for Land and Minerals Management

From: Robert J. Williams *Robert J. Williams*
Assistant Inspector General for Audits

Subject: Audit Report on Cultural Resource Management, Bureau of Land Management (No. 99-I-808)

This report presents the results of our audit of the Bureau of Land Management's Cultural Resource Management Program. The original audit objective was to determine whether the Bureau managed its cultural properties and museum collections in accordance with applicable laws, regulations, and policies. However, because of the results of the audit survey, we changed the audit objectives to evaluate the status of cultural site surveys and to determine whether museum collections were managed adequately. This audit report is the first report of two audit reports on the Bureau's Cultural Resource Management Program.

We found that the Bureau did not adequately survey the public lands to determine the location, nature, and extent of culturally significant sites. Since 1970, the Bureau has comprehensively surveyed less than 5 percent of its public lands for the presence of cultural sites. As a result, the Bureau does not know the locations or the conditions of culturally significant sites on public lands; therefore, the Bureau does not have the information needed to protect these undisclosed cultural resources.

We also found that the Bureau did not adequately control and account for its museum collections. The ownership of artifacts and historical items was not determined, new collected objects were not deposited timely with repositories, required inventories were not completed, and collection agreements were not established with non-Federal repositories. Consequently, the Bureau had little assurance that its museum collections were adequately managed.

In the July 20, 1999, response (Appendix 4) to the draft report from the Acting Director, Bureau of Land Management, the Bureau concurred with Recommendations A. 1, B. 1, and B.2 but did not express specific concurrence or nonconcurrence with Recommendation B.3. Additionally, the Bureau provided alternative approaches to Recommendations B.2 and B.3, which we have revised to recognize the Bureau's suggested alternatives. Based on the

response and additional discussions and information provided by Bureau officials on August 4, 1999, we considered all four of the report's recommendations resolved but not implemented. Accordingly, the unimplemented recommendations will be referred to the Assistant Secretary for Policy, Management and Budget for tracking of implementation.

Since the report's recommendations are considered resolved, no further response to the Office of Inspector General is required (see Appendix 5).

The legislation, as amended, creating the Office of Inspector General requires semiannual reporting to the Congress on all audit reports issued, actions taken to implement audit recommendations, and identification of each significant recommendation on which corrective action has not been taken.

We appreciate the assistance of Bureau personnel in the conduct of our audit.

CONTENTS

	Page
INTRODUCTION	1
BACKGROUND	1
OBJECTIVE AND SCOPE	2
PRIOR AUDIT COVERAGE	3
FINDINGS AND RECOMMENDATIONS	4
A. CULTURAL SITE SURVEYS	4
B. COLLECTIONS MANAGEMENT	9
APPENDICES	
1. OFFICES AND SITES VISITED	14
2. ACRES SURVEYED AND CULTURAL SITE DENSITY	16
3. PRIOR REPORTS ISSUED RELATED TO THE BUREAU'S CULTURAL RESOURCE MANAGEMENT PROGRAM	17
4. BUREAU OF LAND MANAGEMENT RESPONSE	19
5. STATUS OF AUDIT REPORT RECOMMENDATIONS	23

INTRODUCTION

BACKGROUND

According to the Bureau of Land Management's "1998 Annual Report," the Bureau is "steward for the federal government's largest, most varied, and scientifically most important body of archaeological and historical resources." The Archaeological Resources Protection Act of 1979 (16 U.S.C. 470aa) states that "archaeological resources on public lands and Indian lands are an accessible and irreplaceable part of the Nation's heritage" and that archaeological resources and sites which are on public lands should be protected for the present and future benefit of the American people. The Act requires that plans for surveying the public lands be developed to determine the nature and extent of archaeological resources on those lands and that a schedule for surveying lands which are likely to contain the most scientifically valuable archaeological resources be prepared for the purpose of assessing the significance of the sites and determining the measures needed to protect or preserve the cultural resource. According to the Bureau Manual (Bureau Manual 8100, "Cultural Resource Management"), a survey is "the application of professional methods and techniques for field inventory, used to locate and identify cultural properties."

The Bureau has surveyed about 13 million of the 264 million acres of public lands it manages, primarily in 11 western states and Alaska (see Table 1), for the presence of significant cultural sites. Approximately 22 1,000 cultural sites that have archaeological and historical significance have been discovered and recorded as of September 1998 out of an "estimated 4 to 4.5 million cultural properties" existing on the public lands. The Bureau is responsible for protecting, preserving, and holding in public trust cultural artifacts' derived from these areas whether the items are excavated and removed from the sites or remain undisturbed on the land.

As part of its stewardship of the public lands, the Bureau also issues, in accordance with the Archaeological Resources Protection Act of 1979 (16 U.S.C. 470cc and 470ee), permits³ to museums, universities, research institutions, and accredited individuals to survey the public lands for artifacts and significant cultural sites. Permits for cultural site surveys may also be issued to private archaeological consultants to survey and discover any cultural resources that may be disturbed by activities such as drilling operations or access road construction by oil and gas companies on Bureau-managed lands. According to the Bureau Manual (Section 8130), permits require that the permit holders have an agreement with a Bureau-

³Reported in the Bureau of Land Management's 1998 Annual Report.

⁴According to Bureau Manual 8100, a cultural artifact is "any object that shows evidence of human manufacture, modification, or use."

⁵Section 6(a) of the Archaeological Resources Protection Act of 1979 states, "No person may excavate, remove, damage, or otherwise alter or deface any archaeological resource located on public lands or Indian lands unless such activity is pursuant to a permit."

approved **repository**,⁴ such as a university or a museum, to accept and curate all artifacts found as a result of any activities on Bureau-managed land. Bureau archaeologists perform similar work by surveying Bureau lands prior to any (Federal) undertaking⁵ where the land will be disturbed and cultural sites could be degraded or destroyed. Bureau archaeologists also perform proactive self-initiated surveys of Bureau-managed lands in areas potentially rich in cultural resources to document the discovery and the status of previously unknown cultural sites.

According to Bureau officials, the Bureau and its predecessor organization, the General Land Office, authorized the transportation over the past 186 years of more than 20 million objects⁶ collected from the public lands to about 189 professional non-Federal repositories, including museums, universities, and historical societies located in 34 states and Canada. Additionally, the Bureau maintains about 3.5 million museum objects located primarily in two Bureau museum facilities: the Anasazi Heritage Center in Dolores, Colorado, and the Billings Curation Center in Billings, Montana.

Artifacts and objects at these museums are to be inventoried, cataloged, evaluated, and stored by the museums for purposes of research, instruction, and exhibit. The Code of Federal Regulations (36 CFR 79.5) requires agency officials to be “responsible for the long-term management and preservation” of these museum collections. Additionally, the Departmental Manual (411 DM, “Policies and Standards for Managing Museum Collections”) requires the Bureau to inventory annually both Federal and non-Federal repository museum collections. According to Departmental and Bureau officials, inventory completion has been hampered because the historical records for many collections were found to be incomplete or “not well documented.”

OBJECTIVE AND SCOPE

The original objective of the audit was to determine whether the Bureau of Land Management managed its cultural properties and museum collections in accordance with applicable laws, regulations, and policies. Based on the results of our audit survey, we changed the audit objectives to evaluate the status of cultural site surveys and to determine

⁴The Code of Federal Regulations (36 CFR 79.4) defines a repository as “a facility such as a museum, archeological center, laboratory or storage facility managed by a university, college, museum, other educational or scientific institution, a Federal, State or [or] local Government agency or Indian tribe that can provide professional, systematic and accountable curatorial services on a long-term basis.”

⁵Bureau Manual 8 100 defines an undertaking as “Bureau [initiated] direct actions or non-Bureau actions carried out under the sanction of Bureau licenses, leases, permits, or other authorization” that may cause disturbance to the land which could adversely impact cultural resources, such as construction of a stock pond for wildlife management purposes in an area of known archaeological resource sites.

⁶“The Bureau’s budget justification for fiscal year 1997 stated that “more than 3 million objects are **curated** in BLM [Bureau of Land Management] facilities, and approximately 2 1 million are housed in .. non-Federal repositories.”

whether museum collections were managed adequately. This audit report is the first report of two audit reports on the Bureau's Cultural Resource Management Program.

To accomplish our objective, we visited the Bureau's Headquarters, the Bureau's National Curator, 3 Bureau state offices, 16 Bureau field offices, 10 museums or exhibits, a national park, and a state historic preservation office. Additionally, we visited officials in the Department's Office of Acquisition and Property Management regarding the Departmental Interior Museum Program, and we contacted other offices and officials as needed to accomplish the revised objective (offices and sites visited are in Appendix 1). During these visits and contacts, we interviewed Bureau officials and field-level staff responsible for operating the Cultural Resource Management Program, and we observed cultural sites or museum collections at or near these locations.

Our audit, which was conducted from June 1998 through January 1999, was made, as applicable, in accordance with the "Government Auditing Standards," issued by the Comptroller General of the United States. Accordingly, we included such tests of records and other auditing procedures that were considered necessary to accomplish our audit objectives. As part of our review, we evaluated the system of internal controls to the extent that we considered necessary. We found internal control weaknesses in the Bureau's procedures for surveying the public lands and for controlling and accounting for its museum collections. These internal control weaknesses are discussed in the Findings and Recommendations section of this report. Our recommendations, if implemented, should improve the internal controls in these areas.

We also reviewed the Departmental Report on Accountability for fiscal year 1998, which includes information required by the Federal Managers' Financial Integrity Act of 1982, and the Bureau's 1998 Annual Report to determine whether any reported weaknesses were within the objective and scope of our review. Neither report identified weaknesses in the Bureau's Cultural Resource Management Program. However, the Departmental Report cited the "lack of accountability and control over artwork and artifacts" as a Departmentwide mission critical material weakness, which is directly related to the issues discussed in this report.

PRIOR AUDIT COVERAGE

Neither the Office of Inspector General nor the General Accounting Office has issued any audit reports during the past 5 years concerning the Bureau's Cultural Resource Management Program. However, the Office of Inspector General issued four reports in 1990 and 1991 and the General Accounting Office issued a report in 1987 that related to the Bureau's Cultural Resource Management Program (see Appendix 3).

FINDINGS AND RECOMMENDATIONS

A. CULTURAL SITE SURVEYS

The Bureau of Land Management did not adequately determine the location, nature, and extent of culturally significant sites on Bureau-managed public lands. Specifically, since 1970, the Bureau has comprehensively surveyed less than 5 percent of its public lands for the presence of cultural sites. Surveying public lands for cultural sites to determine the nature and extent of archaeological resources on those lands is mandated by the Archaeological Resources Protection Act (16 U.S.C. 470ii), as amended, and Executive Order No. 11593, Protection and Enhancement of the Cultural Environment. These deficiencies occurred because Bureau managers did not allocate the staffing and funding necessary to adequately plan, prioritize, schedule, or ensure completion of a Bureauwide surveying effort. As a result, the Bureau did not know the locations or the conditions of an estimated 3.8 million (4 million estimated less .2 million recorded) culturally significant sites on public lands (see Appendix 2). Therefore, the Bureau did not have the information needed to protect these undisclosed cultural resources.

Prior Conditions

During 1990 and 1991, the Office of Inspector General issued four reports on selected Bureau programs, including the Cultural Resource Management Programs, in four states (Alaska, California, Colorado, and New Mexico) that identified the lack of adequate cultural site surveys as a deficiency. This condition was also reported to the Bureau by the General Accounting Office in its 1987 report. In responses to these reports, the Bureau generally stated that it would develop an overall strategy and plans to identify significant cultural sites, seek funding to accomplish the work, and give added priority to the Program.

During our current audit, we found that the Bureau had not implemented an overall strategy for ensuring the completion of surveys of the public lands for cultural resources. In addition, the Bureau needed to improve its efforts when completing cultural site surveys of public lands. For example, the Four Corners area⁸ has a high density of important and culturally significant resources. However, over a 28-year period,⁸ the Bureau had surveyed less than 6 percent (1.3 million of 22.9 million acres) of the public land in the State of Utah for the presence of cultural sites. Similarly, in Arizona, the Bureau had surveyed less than 5 percent of its public lands for cultural sites. The status of cultural site surveys of Bureau-managed public lands is in Table 1.

⁸The common corner of Utah, Colorado, Arizona, and New Mexico, which is an area where "the surrounding BLM [Bureau of Land Management] managed lands contain thousands of other significant [cultural] sites." ("Four Corners Cultural Resource Proposal," Bureau of Land Management, 1990)

*Fiscal years 1970 through 1997.

**Table 1. Public Lands Surveyed
(As of September 1997)**

State	<u>Public Land</u> (Acres)	<u>Acres Surveyed</u>¹	<u>Public Land Surveyed</u> (Percent)
Alaska	86,908,060	76,910	0.1
Arizona	14,252,778	634,447	4.5
California	14,556,074	1,509,764	10.4
Colorado	8,296,512	1,154,526	13.9
Eastern States	1,531,548	10,225	0.1
Idaho	11,847,328	1,610,352	13.6
Montana	8,060,382	1,104,340	13.7
Nevada	47,840,569	1,591,575	3.3
New Mexico	12,770,569	1,050,182	8.2
Oregon ²	16,603,849	1,138,424	6.9
Utah	22,877,663	1,307,412	5.7
Wyoming	18,383,926	1,735,780	9.4
Bureauwide	<u>263,929,258</u>	<u>12,923,937</u>	(Average) 4.9

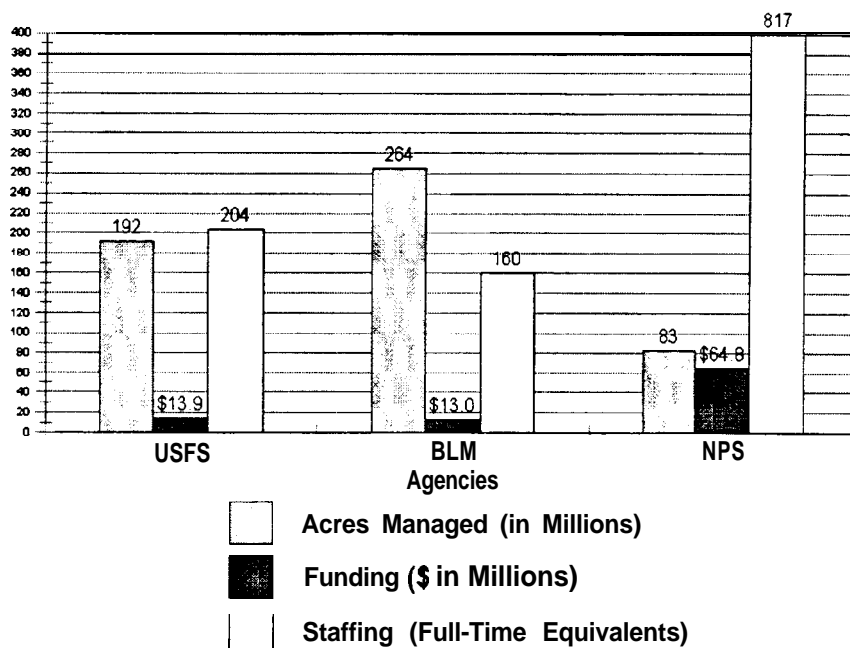
¹Annual and summary data of surveys completed by state during 1970 through 1997 were provided by the Bureau.

²State of Oregon data include Bureau-managed lands in the State of Washington.

We found that the work (ranging from 70 to 99 percent of the work load) of Bureau archaeologists in the offices we visited involved administrative actions required prior to beginning Federal undertakings, such as road construction, or involved providing oversight of permit holders that are using the public lands. Bureau officials at the offices we visited consistently stated that minimal time was devoted to identifying and protecting cultural sites on the many acres of unsurveyed land that the Bureau manages. In that regard, we found that proactive self-initiated surveys of the public lands were seldom conducted because of the substantial work load related to Federal undertakings. For example, in areas such as the Cedar City (Utah) Field Office and the Little Snake (Colorado) Field Office, Bureau officials stated that no self-initiated surveys had been accomplished during the past 15 years.

According to Bureau personnel, surveys were not conducted because of inadequate Program staffing assigned to Cultural Resource Management activities. A comparison of programmatic data related to Cultural Resource Management activities for the Bureau of Land Management, the National Park Service, and the U.S. Department of Agriculture's U.S. Forest Service is in Figure 1.

Figure 1. Budget Data for Similar Agencies
(For Cultural Resource Management Activities* in Fiscal Year 1998)



*Excludes the National Park Service's Cultural Resources Applied Research, National Register, and Center for Preservation Technology and Training Programs, as well as grants issued pursuant to the United States Code (25 U.S.C. 3001).

As shown in Figure 1, although the Bureau of Land Management has significantly more acreage to oversee, fewer resources were allocated, both staffing and funding, to accomplish the Cultural Resource Management mission. Further, at the field offices visited, archaeologists said that cultural sites on the public lands were adversely⁷ affected by activities such as theft, vandalism, destruction, deterioration, and overuse. However, the Bureau continued to issue land-use authorizations, such as easements, leases, permits, or rights-of-way, for specific commercial and recreational purposes or allowed mostly unrestricted access to lands that contain sensitive cultural resource sites.

For example, officials at the Moab (Utah) Field Office estimated that only 63,000 (3 percent) of its 2.1 million acres had been surveyed for cultural sites, and the Kanab Utah Field Office

⁷Bureau Manual 8100 defines an adverse effect as an "alteration of the characteristics of a cultural property that may qualify it for the National Register [of Historic Places], thereby reducing or eliminating the resource's use potential, diminishing its integrity, or disqualifying it from Register eligibility."

estimated that only 135,000 (5 percent) of its 2.7 million acres¹⁰ had been surveyed. Archaeologists in these field offices estimated that about 157,000 archaeological sites were present but were undiscovered and unrecorded because the site surveys had not been accomplished. Officials in these field offices also attributed the lack of surveys to the substantial work load related to Federal undertakings and inadequate allocation of staffing and funding, both of which prevented the Bureau archaeologists from conducting the needed surveys.

Although we recognize the difficulty in trying to both identify and protect sensitive cultural sites while also attempting to promote multiple uses” of the public lands, we believe that the Bureau should devote the necessary staffing and funding to determine the location and the significance of the important cultural, archaeological, and historic sites on the public lands.

Recommendation

We recommend that the Director, Bureau of Land Management, develop and implement a Bureauwide long-range surveying plan for cultural sites which prioritizes those areas that have the most cultural significance. Once the plan is established, the Bureau should seek funding needed to systematically complete the surveys of the prioritized public land areas.

Bureau of Land Management Response and Office of Inspector Reply

In the July 20, 1999, response (Appendix 4) to the draft report from the Acting Director, Bureau of Land Management, the Bureau concurred with the recommendation. Based on the response, we consider the recommendation resolved but not implemented (see Appendix 5).

In its response, the Bureau also stated that it had surveyed more than 13 million acres and recorded more than 220,000 cultural properties and that “[g]iven funding and personnel restrictions this would appear to be substantial progress.” The Bureau also stated, “The finding does not make clear what [cultural survey] standard is being employed to determine what is adequate.”

Although we agree that the number of surveyed acres and recorded properties appears to be substantial, the report states that the Bureau has surveyed only 5 percent of its lands since the requirement to survey the public lands was established about 28 years ago. Furthermore, the Bureau has not planned and prioritized its surveying efforts in areas known to have a high density of significant cultural sites. Most of the completed surveys were conducted pursuant to Federal undertakings and were not the result of proactive survey planning efforts. We

¹⁰The 2.7 million acres include 1.7 million acres within the boundaries of the Grand Staircase-Escalante National Monument.

“The Federal Land Policy and Management Act of 1976, Public Law 94-579, defines multiple use as “the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people.”

recognize that the Bureau's limited funding and staffing allocations have affected its ability to perform public land surveys. However, these resource constraints are further indications of the need for the Bureau to plan and schedule on a prioritized basis a Bureauwide surveying effort to locate the estimated 3.8 million cultural sites on the public lands. Accordingly, we believe that the Bureau should devote the necessary staffing and funds needed to determine the location and the significance of cultural, archaeological, and historic sites on the public lands (prioritized by the Bureau's standard).

B. COLLECTIONS MANAGEMENT

The Bureau did not adequately control and account for its collections of museum artifacts and historical items. Specifically, ownership of artifacts was not adequately determined, collected artifacts were not deposited timely with repositories, required annual inventories were not conducted, and written repository collection agreements were not established. Requirements, guidance, and procedures for the management of museum collections are contained in the Code of Federal Regulations (36 CFR 79, "Curation of Federally-Owned and Administered Archeological Collections") and the Departmental Manual (Part 411, "Policies and Standards for Managing Museum Collections"). These conditions occurred because the Bureau had not finalized and implemented a Bureauwide museum Collections Management Plan that met the requirements of the Departmental Manual. As a result, the Bureau had little assurance that its museum collections were adequately maintained for future use.

Control and Accountability

At three of the five non-Federal repositories visited (see Appendix 1), we found that the ownership of collected objects could not be adequately determined. Museum officials stated that there frequently was no clear record of the source (such as public land) of the collected items and that items coming from public lands were not always identified as property originating from public lands. Also, items collected from public lands were not always sent to the designated repositories, and artifacts collected from public lands were not turned in for curation at museums in a timely manner. For example, use permits issued for cultural purposes by the Bureau's Colorado State Office require the permittee (archaeologist or collector) to submit, within 180 days of the completion of fieldwork, a final report to Bureau officials of field activities. The permit also requires the permittee to deposit all artifacts, samples, and collections and copies of all records, data, photographs, and other documents resulting from work conducted under the permit with an acceptable (to the Bureau) curatorial facility within 90 days after the final report is submitted to the Bureau (270 total days). However, Bureau personnel stated that compliance with these procedures was not monitored or enforced and that some collections had not been deposited with a repository for up to 6 years after fieldwork was completed.

Additionally, the Code of Federal Regulations (36 CFR 79) and the Departmental Manual (411 DM 3.4C, "Inventory Standards") specify the type and scope of required inventories of museum property and provide for exceptions and alternative methods for completing the inventories. Specifically, Chapter 3.4C states, "Annual Inventories. Bureaus must physically verify, or verify in writing through appropriate instruments, the presence and condition of museum property listed in the inventory for property located in both Federal and non-Federal repositories." However, the Bureau did not have a museum inventory procedure; thus, annual inventories were not conducted.

We also found that the Bureau had established written repository collection agreements with only 24 (21 percent) of the 115 museums we reviewed. The non-Federal repositories used

by the Bureau in 11 western states and Alaska **and the** repositories that had a written agreement with the Bureau regarding their responsibilities with respect to items originating from Bureau-managed public lands are listed in Table 2.

Table 2. Non-Federal Repository Agreements by State
(as of September 1998)

<u>State</u>	<u>Number of Repositories</u>	<u>Sumber of Agreements</u>
Alaska	5	3
Arizona	7	0
California	41	0
Colorado	15	1
Idaho	4	4
Montana	8	6'
Nevada	8	1
New Mexico	8	1
Oregon **	5	3
Utah	10	3
Wyoming	<u>4</u>	<u>2</u>
Totals	<u>115</u>	<u>24</u>

*Agreements are for specific objects managed by the Bureau's Billings Curation Center

**State of Oregon data includes data for the State of Washington.

The Code of Federal Regulations (36 CFR 79.8) provides guidelines for the terms and conditions that Federal agencies may include in any contracts, memoranda, agreements, or other written instruments with repositories for curatorial services, such as (1) identification of the collection or group of collections; (2) statement that identifies ownership or jurisdiction over the collection; (3) statement of work to be performed by the repository; (4) Federal agency responsibilities; (5) duration of the agreement and procedures for modification, suspension, extension, and termination; (6) costs associated with the agreement; and (7) statement that specifies the frequency of and methods for conducting and documenting inspections and inventories as stipulated in the Code of Federal Regulations (36 CFR 79.11). The Code (36 CFR 79, Appendix 2) also contains an example of a memorandum of understanding between a Federal agency and a repository for long-term curatorial services for a Federally owned collection.

Repository agreements should be used as a basis for any actions a museum takes with respect to the management of the collections it holds. We believe that executing and following the terms of written repository agreements with all non-Federal repositories that have Bureau collections would improve collections management efforts Bureauwide.

Departmentwide Material Weakness

Since 1990, the Department of the Interior has categorized the “lack of accountability and control over artwork and artifacts” as a Departmentwide mission critical material weakness in its annual Reports on Accountability. Accordingly, the Department has initiated actions to establish organizational responsibilities and time frames to ensure that the weakness is corrected throughout the Department. However, officials in the Department’s Office of Acquisition and Property Management stated that the Bureau of Land Management had been attempting for about 6 years to develop a Collections Management Plan to help ensure control over museum collections. During our review, Departmental officials said that the current plan is still unacceptable to the Department because it is not in compliance with criteria contained in the Departmental Manual (DM 4 1 1)¹² related to overall strategies and priorities for achieving the stated goals, such as assessing the size and status of collections and defining lines of authority and personnel needs. We believe that the timely issuance and implementation of a Collections Management Plan that meets Departmental requirements will assist the Bureau in gaining control of and providing better accountability for its museum collections.

Bureau Actions

During our audit, we noted that the Bureau of Land Management had taken actions to improve the efficiency of its Cultural Resource Management Program. For example, it ratified a National Programmatic Agreement with the National Conference of State Historic Preservation Officers and the Advisory Council on Historic Preservation, and it participated in a Cultural Resource Data Sharing Project with states and other agencies.

National Programmatic Agreement. The National Programmatic Agreement streamlines the Bureau’s process for complying with the National Historic Preservation Act (primarily Section 106). The Agreement authorizes, within specific stipulations, Bureau officials to proceed with Section 106 clearance actions and approvals of Federal undertakings without specific review by the applicable state Historic Preservation Officer and the Advisory Council on Historic Preservation. This process results in Federal undertakings being approved faster than under previous procedures. Since these types of actions (Section 106 clearances) are a significant portion of the archaeologists’ work load at the field-office level, we believe that implementation of the National Programmatic Agreement should allow Bureau staff more time for other Cultural Resource Program responsibilities, such as resource protection efforts or proactive site surveys of the public lands.

¹²The Departmental Manual (411 DM 2) requires bureau-level planning to address the needs of all bureaus’ museum property, including identifying priorities, strategies, and policies for managing museum property. Required documentation includes a Collection Management Plan that identifies problems with collections management, corrective actions and respective priority, responsible officials, and cost estimates for the corrective actions.

Data Sharing Project. The Bureau and the state Historic Preservation Officers in 11 western states and Alaska have initiated long-term cooperative agreements to improve the use of automation for compiling and maintaining cultural site inventory data. These agreements provide for sharing goals, resources, and expertise, with the objective of developing automated cultural resources databases and electronic mapping systems that can be used to better identify and help to preserve the Nation's cultural resources. This overall effort includes many related initiatives among the various states, such as development of data standards, data and map accessibility via Internet connectivity, and cooperative data entry support. The benefits of the Data Sharing Project include improved data quantity and quality; streamlined work-flow processes; and cooperative use of technological advances, such as geographic information systems and spatial database concepts.

Recommendations

We recommend that the Director, Bureau of Land Management:

1. Ensure that the Bureau develops and implements in a timely manner a Collections Management Plan which is in compliance with Departmental property management requirements.
2. Ensure that the Bureau's revised Collections Management Plan includes procedures for permittee and repository confirmation to the Bureau of receipt of Federal (Bureau) collections, including a brief description of the collected objects. Also, both Federal (Bureau) and non-Federal repositories should be requested to identify, in accordance with the repositories' capabilities, the Federal (Bureau) collections. Thereafter, the reported inventory information should be validated periodically.
3. Contact all Bureau Museum Partnership Program repositories to determine the feasibility of initiating repository agreements regarding the management of Federal (Bureau) collections. Also, written repository agreements should be developed and executed with those non-Federal repositories willing to participate in a repository agreement process.

Bureau of Land Management Response and Office of Inspector Reply

In the July 20, 1999, response (Appendix 4) to the draft report from the Acting Director, Bureau of Land Management, the Bureau concurred with Recommendation 1, stated both concurrence and partial concurrence with Recommendation 2, and did not specifically concur or express nonconcurrence with Recommendation 3. Additionally, the Bureau provided an alternative approach to Recommendations 2 and 3.

The Bureau's suggested approach to Recommendation 2 involves (1) requiring that permittees and repositories report the receipt of newly accepted Federally owned collections to the Bureau and (2) requesting repositories to identify (inventory) their collections and periodically conduct Bureau validations of the reported inventories. We believe that these suggested changes to the recommendation, if made, will correct the weaknesses in the

Bureau's inventory and control of its museum collections. The Bureau's suggested approach to Recommendation 3 involves initiating repository agreements only with those non-Federal repositories that voluntarily agree to participate in a repository agreement process. We believe that this approach, if implemented, can be effective in improving accountability over the Bureau-managed museum collections.

Based on the Bureau's suggested alternatives, we have revised Recommendations 2 and 3 in the final report and consider the alternatives to be fully responsive to the finding and the recommendations. Further, Bureau officials provided additional information on August 4, 1999, which indicated their concurrence with the revised recommendations and identified the official responsible for implementation. The Bureau also stated that the finalized Collections Management Plan would include target dates for implementation of the recommendations. Therefore, we consider Recommendations 1, 2, and 3 resolved but not implemented (see Appendix 5).

OFFICES AND SITES VISITED

<u>Offices and Sites Visited or Contacted</u>	<u>Location</u>
Department of the Interior Assistant Secretary for Policy, Management and Budget Office of Acquisition and Property Management	Washington, D.C.
Bureau of Land Management Headquarters Cultural Resource Management Office National Curator Alaska State Office* Arizona State Office* California State Office* Colorado State Office Anasazi Heritage Center Kremmling Field Office Glenwood Springs Field Office Gunnison Basin Field Office Little Snake Field Office Royal Gorge Field Office San Juan Field Office San Luis Field Office Saguache Field Office** Uncompahgre Basin Field Office White River Field Office* Idaho State Office* Cascade Field Office* Jarvis Field Office* New Mexico State Office* Farmington Field Office Montana State Office Billings Curation Center Billings Field Office Pompeys Pillar National Historic Landmark Powder River Field Office Nevada State Office*	Washington, D.C. Sacramento, California Anchorage, Alaska Phoenix, Arizona Sacramento, California Lakewood, Colorado Dolores, Colorado Kremmling, Colorado Glenwood Springs, Colorado Gunnison, Colorado Craig, Colorado Canon City, Colorado Durango, Colorado Alamosa, Colorado Saguache, Colorado Montrose, Colorado Meeker, Colorado Boise, Idaho Boise, Idaho Twin Falls, Idaho Santa Fe, New Mexico Farmington, New Mexico Billings, Montana Billings, Montana Billings, Montana Custer, Montana Miles City, Montana Reno Nevada

*Office contacted.

● *1vService First" office shared with U.S. Forest Service.

<u>Offices and Sites Visited (Continued)</u>	<u>Location</u>
Oregon State Office*	Portland, Oregon
Spokane Field Office*	Spokane, Washington
Utah State Office	Salt Lake City, Utah
Cedar City Field Office	Cedar City, Utah
Grand Staircase-Escalante	
National Monument	Cedar City, Utah
Kanab Field Office	Kanab, Utah
Moab Field Office	Moab, Utah
San Juan Field Office	Monticello, Utah
Wyoming State Office*	Cheyenne, Wyoming
National Park Service	
Mesa Verde National Park	Colorado
U.S. Army Corps of Engineers	
Mandatory Center of Expertise for	
Archaeological Curation and	
Collections Management*	St. Louis, Missouri
U.S. General Accounting Office*	Denver, Colorado
State of Colorado	
State Historic Preservation Office	Denver, Colorado
State of Wyoming	
State Historic Preservation Office*	Cheyenne, Wyoming
Non-Federal Repositories:	
Colorado State University	Fort Collins, Colorado
Denver Museum of Natural History*	Denver, Colorado
Museum of Western Colorado	Grand Junction, Colorado
Pioneer Museum	Colorado Springs, Colorado
University of Denver	Denver, Colorado
University of Southern Colorado	Pueblo, Colorado
Museums/Exhibits With Collections Borrowed	
From the Bureau of Land Management	
First Interstate Bank of Billings	Billings, Montana
Prairie County Museum	Terry, Montana

ACRES SURVEYED AND CULTURAL SITE DENSITY'

(For selected field office acreage)

<u>Resource Area/Field Office</u>	<u>Public Land Acres</u>	<u>Percent Surveyed</u>	<u>Sites Per Square Mile</u>	<u>Number of Archaeological Sites</u>		
				<u>In Area</u>	<u>Recorded</u>	<u>Unrecorded</u>
Big Dry, Montana	1,703,730	5	4	9,750	650	9,100
Billings, Montana	402,064	6	14	8,500	581	7,919
Cedar City, Utah	2,500,000	5	12	46,875	2,500	44,375
Grand Staircase-Escalante National Monument, Utah	1,700,000	5	20 ²	53,125	1,082	52,043
Jarbridge, Idaho	1,550,000	14	9	18,900	3,000	15,900
Kanab, Utah	1,000,000	5	20 ²	31,250	579	30,671
Kremmling, Colorado	398,275	3	5	6,130	3,000	3,130
Little Snake, Colorado	1,300,000	3	17	34,500	5,000	29,500
Moab, Utah	2,100,000	3	24	80,000	5,000	75,000
Powder River, Montana	1,080,675	5	25	42,000	4,500	37,500
San Juan, Colorado	994,000	12	100 ³	173,000	20,740	152,260
San Juan, Utah	1,800,000	10	89	250,000	21,410	228,590
Uncompahgre Basin, Colorado	9 19,000	10	55	75,000	9,000	66,000
Bureauwide (all states)	263,929,258	4.9	9.7	4,000,000 ⁴	22 1,000	3,779,000

¹All field office figures are "best estimates" by Bureau officials.

²"Best estimate" was reported as 20 to 50.

³"Best estimate" was reported as 100 to 200.

⁴Reported as 4 million to 4.5 million in the Bureau of Land Management's 1998 Annual Report

PRIOR REPORTS ISSUED RELATED TO THE BUREAU'S CULTURAL RESOURCE MANAGEMENT PROGRAM

The Office of Inspector General has issued four prior reports on the Bureau of Land Management's Cultural Resource Management Program as follows:

- "Survey of Selected Programs of the Colorado State Office, Bureau of Land Management" (No. 90-64), issued in April 1990, stated that five Bureau resource areas did not perform surveys to determine what cultural resources needed management oversight and that the Bureau had not allocated sufficient personnel and financial resources to comply with the existing priority mandates in a timely manner. The report recommended that the Bureau develop an overall management strategy for identifying, protecting, and managing cultural resources.

- "Survey of Selected Programs of the Alaska State Office, Bureau of Land Management" (No. 90-84), issued in July 1990, stated that three Bureau district offices had not performed the required inventories to identify cultural resources on public lands and that the Bureau had not allocated sufficient personnel and financial resources to comply with the existing mandates. The report recommended that the Bureau develop an overall strategy for identifying, protecting, and managing cultural resources in Alaska.

- "Survey of Selected Programs of the New Mexico State Office, Bureau of Land Management" (No. 91-I-198), issued in November 1990, stated that lands had not been inventoried, cultural resource sites had not been adequately protected, and artifacts removed from cultural resource sites had not been accounted for. Furthermore, the report stated that the Bureau had not allocated sufficient personnel and financial resources to comply with existing mandates. The report recommended that the Bureau develop and implement an overall strategy that provides for inventorying, protecting, and accounting for cultural resources.

- "Survey of Selected Activities of the California State Office, Bureau of Land Management" (No. 91-I-654) issued in March 1991, stated that 10 resource areas had not completed required inventories to identify cultural resources and that the Bureau had only partially accounted for artifacts removed from cultural resource sites. The report also stated that the Bureau had not allocated sufficient personnel and financial resources to comply with existing mandates. The report recommended that the Bureau develop and implement a strategy for cultural resources in California.

The General Accounting Office, in December 1987, issued the report "Cultural Resources, Problems Protecting and Preserving Federal Archeological Resources" (No. GAO/RCED-88-3). The report stated that agencies could make more efficient and effective use of the funds and staff resources which were available for protecting their archeological sites if they had more information on the number, location, and relative significance of these sites. The report also stated that most of the surveys undertaken to identify sites were conducted to obtain clearances for development projects and that they therefore were not necessarily directed to those areas which had the greatest potential for having important archeological resources. The report recommended that the respective agencies develop plans for surveying those areas which were not scheduled for project development and ensure that a "reasonable number" of these surveys are performed each year.



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Washington, D.C. 20240

<http://www.blm.gov>

In Reply Refer To:

1245 (240/830)

JUL 20 1999

MEMORANDUM

To: Acting Inspector General

Through: *for* Sylvia V. Baca *Piet de Wit* JUL 20 1999
Acting Assistant Secretary, Land and Minerals ManagementFrom: *for* Tom Fry *Tom Walker*
Acting Director, Bureau of Land ManagementSubject: Response to Draft Audit Report on Cultural Resource Management
(No. C-IN-BLM-003-98 D)

Thank you for the opportunity to respond to the May 1999 draft audit report on Cultural Resource Management. We appreciate the time and effort put into producing the document and plan to use it, where appropriate, to aid in our continual improvement of the program. In general, this report portrays the complexity of the cultural resource issues we must address as part of our land management responsibilities. Our specific concurrence, comments, and suggested revised recommendations are attached.

The Bureau of Land Management (BLM) sustains the health, diversity and productivity of the public lands for the use and enjoyment of present and future generations. The public lands are valued for their environmental resources, recreational and scenic values, their vast open spaces, resource commodities and cultural and paleontological resources. The lands administered by the BLM are some of the most culturally diverse and scientifically important lands managed by any Federal agency and it is from them that our cultural resources are derived. With limited funds available, prioritization is necessary, and the Bureau's first priority must be to preserve and protect archaeological, historical and paleontological sites in place. This priority aligns directly with the Secretary of the Interior's first priority regarding America's archaeological heritage, as expressed in "The Federal Archeology Program, Report to Congress, 1996-97" to "Preserve and Protect Archeological Sites in Place."

Any general question regarding this audit may be referred to Gwen Midgette, BLM Audit Liaison Officer, at (202) 452-7739, any program specific questions may be referred Dr. Stephanie Dan-radio, National Curator, (916) 978-4650.

Attachment

Bureau of Land Management (BLM) Response to Draft Audit Report on Cultural Resource Management (No. C-IN-BLM-003-98 D)

FINDINGS AND RECOMMENDATIONS

A. Cultural Site Surveys

OIG Recommendation: *We recommend that the Director, Bureau of Land Management, develop and implement a Bureauwide long-range surveying plan for cultural sites which prioritizes those areas that have the most cultural significance. Once the plan is established, the Bureau should seek funding needed to systematically complete the surveys of the prioritized public land areas.*

Concur:

The BLM's Preservation Board, led by the Bureau's Federal Preservation Officer, has established a committee to develop a surveying plan in response to this recommendation. We expect to have a draft plan for agency and field review by April 2000. Once the plan is approved, the Bureau will pursue the funding needed for implementation through the budget process. The responsible official for implementing this recommendation is the Assistant Director, Renewable Resources and Planning (AD, RR&P).

We are concerned that the draft audit report states the BLM's efforts to "determine the location, nature, and extent of culturally significant sites on Bureau-managed public lands" is inadequate and deficient. Since the requirement was established, the Bureau has surveyed over 13,413,690 acres (over 20,000 square miles) with 220,809 cultural properties recorded. Given funding and personnel restrictions this would appear to be substantial progress. The finding does not make clear what standard is being employed to determine what is adequate.

B. Collections Management

OIG Recommendation 1. *Ensure that the Bureau develops and implements a Collections Management Plan which is in compliance with Departmental property management requirements and is issued in a timely manner.*

Concur:

The BLM developed and implemented a Museum Collections Management Plan in 1997. The Plan is in the revision process. The revised plan will be in compliance with applicable laws, regulations and professional standards. The BLM will work with the Department to revise Departmental Property requirements to comply with applicable laws, regulations and professional standards. We expect the plan to be finalized by the end of FY '99. The responsible official for implementing this recommendation is the AD, RR&P.

OIG Recommendation 2. *Perform baseline physical inventory and document the presence and the condition of all bureau museum property located in both Federal and non-Federal repositories. Thereafter, annual inventories of the presence and the condition of all baseline property and any newly acquired museum property should be conducted as required by the Bureau in accordance with the Departmental Manual (411 DM 3.4C).*

Concur:

The BLM partially concurs with this recommendation for internal Bureau collections only. We do have a plan to eliminate the cataloging backlog at Bureau facilities, beginning with a \$1,000,000 overtarget request for FY 2001. *The* revised version of the Museum Collections Management Plan will address all internal collections requirements. Current projections show that an annual increase of \$900,000 a year until 2007 will be necessary to eliminate the cataloging backlog at the Bureau facilities of the Anasazi Heritage Center and the Billings Curation Center. After the cataloging backlog is eliminated, cyclic specific inventories (i.e., most valuable materials, most scientifically significant materials, materials on exhibit, materials researchers have used, etc.) will be possible. The most efficient strategies, cycle and types of inventories will be decided upon after the cataloging backlog is completed. The responsible official for implementing this recommendation is the AD, RR&P.

Due to the projected cost associated with conducting comprehensive inventories, the BLM is providing an alternative approach to OIG recommendation 2 concerning non-Federal repositories. This will provide reasonable assurance of the presence and proper management of the collections.

Suggested Revised Language For Recommendation 2 Concerning Non-Federal Repositories

We suggest this recommendation be revised to read: *We recommend the Bureau incorporate into the Museum Collections Management Plan additional procedures for permittee and/or repository confirmation of receipt of Federal collections, including a brief description of materials. We also recommend the Bureau request of all repositories identified in BLM permits, their written collections management procedures. In addition the Bureau should request repositories identify BLM collections on hand to the best of their ability. The Bureau will conduct sample validation reviews based upon the information received.*

OIG Recommendation 3. *Develop and execute written repository agreements with all non-Federal repositories describing the responsibilities of both the Bureau and the non-Federal repositories regarding the management of Bureau-owned collections.*

The BLM has had substantial experience with a partnership initiative called the Museum Partnership Program. Through this effort, we have directed limited funding toward the actual improvement of collections and increasing the collection's availability to researchers and the public. This and other similar approaches target critical priorities of curation, research and outreach needs mutually determined by the Bureau and partner museums, to achieve the most important goals of ARPA; i.e., effective resource management and public access to collections.

The BLM will continue to investigate the willingness of museum collections facilities to enter into agreements with the Bureau and enter into agreements with those which are interested. In addition, the Bureau will appropriately monitor the permitting process, to ensure that permittees secure curatorial services only at institutions that can provide adequate services.

Given the above experience and commitment we are proposing the following alternative approach to OIG recommendation 3

Suggested Revised Language for Recommendation 3

We recommend the language for this recommendation be changed to: *The BLM will contact all partner museums and facilities housing collections originating from public lands to explore the feasibility of curation agreements and critical priorities of preservation, research, interpretation and exhibits.*

STATUS OF AUDIT REPORT RECOMMENDATIONS

Finding/Recommendation Reference	Status	Actions Reaquired
A.1	Resolved; not implemented.	No further response to the Office of Inspector General is required. The recommendation will be referred to the Assistant Secretary for Policy, Management and Budget for tracking of implementation.
B.1, B.2, and B.3	Resolved; not implemented.	No further response to the Office of Inspector General is required. The recommendations will be referred to the Assistant Secretary for Policy, Management and Budget for tracking of implementation.

**ILLEGAL OR WASTEFUL ACTIVITIES
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